
EXHIBIT F



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BRAGALONE CONROY PC

November 20, 2020

VIA EMAIL

Jennifer A. Kash
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Re: *Cellular Communications Equipment LLC v. HMD Global Oy*, Case No. 2:20-CV-00078-JRG (E.D. Texas) – Protective Order Violation

Dear Jennifer:

I write on behalf of my client, Cellular Communications Equipment LLC (“CCE”). It has come to CCE’s attention that counsel for HMD intends file a motion in a different matter before a court in the Central District of California. As part of that motion, CCE understands that counsel for HMD intends to disclose information produced by CCE in this Action and designated under the Protective Orders, both in the text of the motion and attachments thereto. The Court’s Protective Orders in this matter (Dkt. Nos. 31, 35) do not authorize HMD’s counsel to disclose confidential information produced by CCE in this Action to a Central District of California court or its personnel. *See* Dkt. No. 31 at ¶ 5. Further, the Protective Orders prevent HMD from using such confidential information in a different Action. *See id.* at ¶ 7.

Moreover, CCE understands that HMD and its counsel intend to improperly disclose third party confidential information, including [REDACTED]

[REDACTED] have been provided no notice that HMD intends to disclose their confidential information in another forum.

CCE further understands that, in addition to sealed filings, HMD’s counsel intends to file public versions of the motion and requests that ARC provide redactions. The Protective Orders preclude HMD or its counsel from publicly disclosing confidential information produced in this matter, and HMD cannot relieve itself of its duty to abide by the Protective Orders by requesting that non-party ARC identify and redact information for HMD.



I request that you immediately confirm that HMD and its counsel will abide by the Court's Protective Orders and engage in no such improper filing. Otherwise, CCE will move the Court on an expedited basis to enforce its Protective Orders.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Jeffrey R. Bragalone'.

Jeffrey R. Bragalone